



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

May 25, 2021

**VIA ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Abduraman Iseni, et. al*, 20 Cr. 660 (ALC)**

Dear Judge Carter:

The Government, after conferring with and receiving no objections from defense counsel, respectfully writes to provide the Court with a joint status report in the above-referenced case, as ordered by the Court on February 11, 2021.

The Government has produced voluminous discovery in this case, and is continuing to produce relevant materials on a rolling basis. The Government expects that the large majority of Rule 16 productions will be complete in the next few weeks, and is also ascertaining to ensure that it has produced all remaining Rule 16 materials in its possession. The Government respectfully requests that the Court schedule a status conference, or alternatively order that the parties provide another joint status report, for approximately 90 days from now, so that the Government can continue to produce discovery, defendants can review those materials, and the parties can continue to discuss potential pre-trial resolutions. The Government has informed all defense counsel of this proposed approach; no defense attorney has objected.

The Government also respectfully applies to the Court to exclude time to the newly scheduled date, in the interests of justice, pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161, because such an exclusion is appropriate given the large number of defendants and voluminous discovery productions, and is necessary to allow defense counsel the opportunity for effective preparation and to discuss potential pre-trial dispositions. The Government has also asked defense counsel their position on the exclusion of time; no defense attorney has objected.

The Government is available to answer any questions the Court may have.

Very truly yours,

AUDREY STRAUSS  
United States Attorney

by: /s/  
Samuel Raymond / David R. Felton  
Assistant United States Attorneys  
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cc: All Defense Counsel (by ECF)